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July 3, 2023

Via ECF

Hon. Hector Gonzalez
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Jones v. Emirates Airlines, Case No. 1:23-cv-04649

Dear Judge Gonzalez,

Pursuant to the Court's Individual Practices, Defendant Emirates Airlines ("Emirates") submits this Letter Motion seeking an extension of the Court's Case Management Plan deadline (Dkt. No. 4) from **July 27, 2023** to **August 28, 2023**. (A 30-day extension would result in a date of Saturday, August 26; accordingly, Emirates has specified the next business day.) Emirates has not previously requested an extension of this deadline.

Only one date or deadline would be affected by this extension. By operation of Fed. R. Civ. P. 26(f), the Court's July 27 deadline requires the parties to confer on or before July 6, 2023. On June 30, Emirates sought by email to schedule a conference with Ms. Jones's counsel, but received no response. Ms. Jones's letter later that day (Dkt. No. 7) sought to withdraw her counsel and proceed *pro se*.

The only other scheduled dates at this time are with respect to non-discovery submissions: Ms. Jones is required to respond to Emirates' Notice of Removal and Pre-Motion Conference Letter by July 6, 2023, and Ms. Jones's counsel is required to move for admission *pro hac vice* or seek leave to withdraw as counsel by July 6, 2023.

Given the uncertainty surrounding Ms. Jones's representation and the July 6 deadline for the parties to confer, Emirates believes it prudent to extend the Court's deadline to August 28 to ensure that the parties can meaningfully discuss the course and parameters of discovery and timely submit their Case Management Plan, as well as the Court's required joint letter. Counsel for Ms. Jones consents to this Motion.

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Respectfully,

/s/ Timothy H. Gray
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Attorney for Defendant Emirates Airlines

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Letter Motion upon counsel for the Plaintiff by electronic mail, addressed to johnduru@aol.com.

Dated: July 3, 2023
Washington, DC

KATTEN MUCHIN ROSENMAN LLP

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